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*Proposed Counsel for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Seabras 1 USA, LLC *et al.*,

Debtors.¹

Chapter 11

Case No. 19-14006 (SMB)

(Jointly Administered)

**NOTICE OF AGENDA FOR MATTER SCHEDULED
FOR HEARING ON JANUARY 10, 2020 AT 11:00 A.M.**

PLEASE TAKE NOTICE that on December 22, 2019, Seabras 1 USA, LLC and Seabras 1 Bermuda Ltd., as debtors and debtors in possession (collectively, the “**Debtors**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that a hearing has been scheduled for January 10, 2020 for 11:00 a.m. (Prevailing Eastern Time) before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, Bankruptcy Court, One Bowling Green, Room 723, New York, New York 10004 (the “**Hearing**”).

PLEASE TAKE FURTHER NOTICE that an agenda with respect to the Hearing is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004, or (iii) from the Debtors’ proposed notice and claims agent, Stretto or by calling (855) 236-0103 (toll-free) or (949) 317-1699 (international) or by e-

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are Seabras 1 USA, LLC (0027) and Seabras 1 Bermuda Ltd. (7149). The Debtors’ principal offices are located at 600 Cummings Center, Suite 268-Z, Beverly, MA 01915.

mail at TeamSeabras@stretto.com. Note that a PACER password is needed to access documents on the Court's website.

I. UNCONTESTED MATTERS

1. Debtors' Motion for Entry of Interim and Final Orders Under Bankruptcy Code Sections 105(a), 361, 362, 363, and 507 and Bankruptcy Rules 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [D.I. 41]

- i. **Objection Deadline**: January 9, 2020 at 4:00 p.m. (Eastern Time)
- ii. **Objections Filed**: None.
- iii. **Related Documents**
 1. Declaration of Mark E. Dendinger in Support of an Order to Show Cause Scheduling Hearing on Shortened Notice with Respect to Debtors' Motion for Entry of Interim and Final Orders Under Bankruptcy Code Sections 105(a), 361, 362, 363, and 507 and Bankruptcy Rules 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [D.I. 42]
 2. Order to Show Cause Signed on 1/7/2020. Re: Scheduling Hearing on Shortened Notice Pursuant to Bankruptcy Rule 4001(B)(2) and Local Rule 9077-1(A) With Respect to Debtors Motion for Entry of Interim and Final Orders Under Bankruptcy Code Sections 105(a), 361, 362, 363, and 507 and Bankruptcy Rules 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [D.I. 43]
- iv. **Status**: The Debtors have received no formal objections to this matter. Counsel to Seabras Group, LLC has indicated that Seabras Group, LLC does not intend to object to entry of the proposed interim cash collateral order, but it does have some questions regarding the proposed budget. The Debtors are working in good faith to address such questions.

Dated: January 8, 2020
New York, New York

BRACEWELL LLP

/s/ Robert G. Burns

Robert G. Burns

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